



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

In Reply Refer To: Mail Code 3HW12

FEB 10 1988

Mr. Stephen V. Moser, Senior Counsel  
Firestone Tire & Rubber Co.  
1200 Firestone Parkway  
Akron, OH 44317

Re: Occidental Chemical Corporation Site,  
Montgomery County, PA

Dear Mr. Moser:

The Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9604(e), as amended by Superfund Amendments and Reauthorization Act of 1986 ("SARA") P.L. No. 99-499, 100 Stat. 1613 (1986), your company is requested to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its officers, employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), which were transported to, stored, or disposed of at the Occidental Chemical Corporation site, Montgomery County, Pennsylvania.

In a letter issued to you on February 5, 1987, EPA requested information on the above referenced site. EPA has received and reviewed your response to this request. This letter is to advise you that your letter of March 13, 1987 does not adequately respond to the information request, therefore additional information is required. EPA requires that you submit a supplemental response in order to substantiate your initial letter.

A site inspection conducted by the NUS Corporation detected several contaminants in the on-site seepage lagoons and the process water wells. These contaminants include trichloroethene, trans-1,2-dichloroethene and vinyl chloride.

AR200073

The response should include, but not be limited to information and documentation concerning:

1. the types and quantities of the hazardous substances sent to the Occidental Chemical Corporation site;
2. the date(s) such substances were sent to the Occidental Chemical Corporation site;
3. the state (i.e., liquid, solid, or gaseous) of the substances sent to the Occidental Chemical Corporation site and the manner in which the substances were transported to, treated, stored or disposed (i.e. drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.);
4. any correspondence between your company and any regulatory agencies regarding such substances;
5. any correspondence between the Occidental Chemical Corporation site and any third party regarding such substances;
6. the identity of, and documents relating to, any other person who generated, transported, treated, stored, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances at the Occidental Chemical Corporation site;
7. copies of any deeds, rights-of-way, leases, or other real interests which your company has in the Occidental Chemical Corporation site.

Please provide copies of any documents that were maintained by your company which relate to the transport to, or the treatment, storage, or disposal of hazardous substances to the Occidental Chemical Corporation site.

In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies.

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonorecords, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

AR200074

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

Failure to respond fully and truthfully to each and every Information Request within ten (10) days of receipt of this letter, or to adequately justify such failure to respond, can result in enforcement action by EPA pursuant to Section 104 of CERCLA, as amended, and/or Section 3008 of RCRA. Each of these statutes permit EPA to seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001.

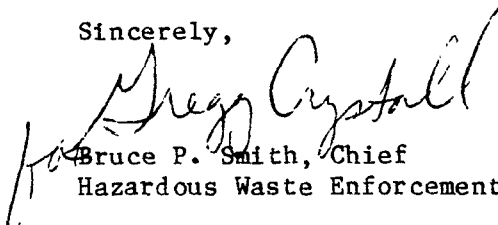
Please send the required information to:

Suzanne Billings  
U.S. Environmental Protection Agency, Region III  
PA CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Building, 6th Floor  
Philadelphia, PA 19107

If you have any questions concerning this matter, please contact Suzanne Billings at (215) 597-8240.

This information collected request is not subject to Office of Management and Budget review under the Paperwork Reduction Act, 44 U.S.C. Sections 3501-3520.

Sincerely,

  
Bruce P. Smith, Chief  
Hazardous Waste Enforcement Branch

3 Enclosures: 1. Location Map, 2. Original 104(e) letters, 3. Firestone Response to Original 104(e) letter

cc: James Snyder, PADER

AR200075



# POTTSTOWN

# LOWER POTTSGROVE TWP

# SANATOGA

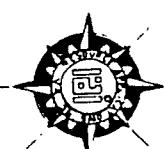
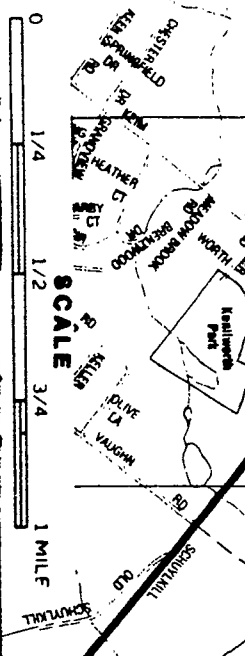
# EAST COVENTRY TWP

# OCCIDENTAL CHEMICAL CORPORATION SITE

# KENILWORTH

# SOUTH POTTSTOWN

# NORTH COVENTRY TWP



AR200077

VICINITY MAP

FIGURE 2